

HERKIMER COUNTY INDUSTRIAL DEVELOPMENT AGENCY  
WHISTLEBLOWER POLICY

Every member of the board (the “Board”) of the Herkimer County Industrial Development Agency (the “Agency”) and all officers and employees thereof, in the performance of their duties shall conduct themselves with honesty and integrity and observe the highest standards of business and personal ethics as set forth in the Code of Ethics of the Agency (the” Code”).

Each member, officer or employee is responsible to report any violation of the Code (whether suspected or known) to the Agency’s Chairman. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position with the Agency, will be subject to any retaliation for making a good faith claim and, any employee who chooses to retaliate against someone who has reported a violation, shall be subject to disciplinary action which may include termination of employment. Regardless, any claim of retaliation will be treated as a separate offense.

The Chairman is responsible for immediately forwarding any claim to the Agency’s counsel who shall investigate and handle the claim in a timely manner.

Approved and adopted this 26<sup>th</sup> day of April 2007.